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EXAMINER

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2612

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**BEFORE THE BOARD OF PATENT APPEALS
AND INTERFERENCES**

MAILED

APR 04 2006

GROUP 2600

Application Number: 10/782,309
Filing Date: February 19, 2004
Appellant(s): JUELS, ARI

JOSEPH B. RYAN
For Appellant

EXAMINER'S ANSWER

This is in response to the appeal brief filed 1/12/2006 appealing from the Office action mailed 8/2/2005.

(1) Real Party in Interest

A statement identifying by name the real party in interest is contained in the brief.

(2) Related Appeals and Interferences

The Examiner is not aware of any related appeals, interferences, or judicial proceedings, which will directly affect or be directly affected by or have a bearing on the Board's decision in the pending appeal.

(3) Status of Claims

The statement of the status of claims contained in the brief is incorrect. A correct statement of the status of the claims is as follows:

This appeal involves claims 1-7, 9-16, 20, 23-27, and 29-33.

Claims 1, 2, 4-7, 20, 23-25, 30, 32 and 33 are rejected under 35 U.S.C. 103(a) over U.S. Patent No. 6,842,106 (hereinafter "Hughes") in view of U.S. Patent No. 4,928,098 (hereinafter "Dannhaeuser").

Claims 3 and 31 are rejected under 35 U.S.C. 103(a) as being unpatentable over Hughes and Dannhaeuser in view of U.S. Patent No. 6,724,895 (hereinafter "Turner").

Claims 9-16, 26-27, and 29, are rejected under 35 U.S.C. 103(a) as being unpatentable over Hughes and Dannhaeuser in view of U.S. Patent No. 6,225,889 (hereinafter "Furuta").

The rejection of claims 8 and 28 in the Final Office action has been withdrawn based on appellant's argument in the appeal brief.

Claims 8, 17-19, 21-22, and 28 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

(4) Status of Amendments After Final

The appellant's statement of the status of amendments after final rejection contained in the brief is correct.

(5) Summary of Claimed Subject Matter

The summary of claimed subject matter contained in the brief is correct.

(6) Grounds of Rejection to be Reviewed on Appeal

The appellant's statement of the grounds of rejection to be reviewed on appeal is correct.

(7) Claims Appendix

The copy of the appealed claims contained in the Appendix to the brief is correct.

(8) Evidence Relied Upon

6,842,106	Hughes et al	1-2005
6,724,895	Turner et al	4-2004
6,225,889	Furuta et al	5-2001

(9) Grounds of Rejection

The following ground(s) of rejection are applicable to the appealed claims:

Claim Rejections - 35 USC § 103

1. The following is a quotation of 35 U.S.C. 103(a) which forms the basis for all obviousness rejections set forth in this Office action:

(a) A patent may not be obtained though the invention is not identically disclosed or described as set forth in section 102 of this title, if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains. Patentability shall not be negated by the manner in which the invention was made.

2. The factual inquiries set forth in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966), that are applied for establishing a background for determining obviousness under 35 U.S.C. 103(a) are summarized as follows:

1. Determining the scope and contents of the prior art.
2. Ascertaining the differences between the prior art and the claims at issue.
3. Resolving the level of ordinary skill in the pertinent art.
4. Considering objective evidence present in the application indicating obviousness or nonobviousness.

3. Claims 1-2, 4-7, 20, 23-25, 30, and 32-33 are rejected under 35 U.S.C. 103(a) as being unpatentable over USP 6,842,106 (Hughes et al) in view of USP 4,928,098 (Dannhaeuser).

In claims 1 and 2, Hughes teach of a method for use in an RFID system comprising at least one or more tags (RFID device 44) and at least one or more

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reader/s (32) which communicates with the tag {abstract}, the method comprising the steps of:

associating a plurality of pseudonyms (multiple secret key value 66 or 68) with the tag (RFID device 44) {col. 5, lines 47-50; col. 6, lines 32-33, lines 64-65; col. 7, lines 51-53}; and

transmitting from the tag (RFID device 44) pseudonyms in response to different reader queries of the RFID device {col. 6, lines 15-18, lines 27-28}. In this case, the pseudonyms are converted to pseudo random number based on the key value {col. 6, lines 18-26};

wherein an authenticator (authorized verifier) is able to determine that the different transmitted pseudonyms (multiple key value) are associated with the same tag {col. 5, lines 61-64; col. 6, lines 42-46}. In this case, the reader doubles as an authenticator {col. 6, lines 16-18}.

Although Hughes teaches of using multiple key values {col. 6, lines 64-65; col. 7, lines 52-58}, Hughes does not disclose expressly **“transmitting the different ones of the pseudonyms (multiple secret key values)”**. Dannhaeuser teaches of storing plurality of pseudonyms in algorithmic or tabular form {Dannhaeuser, col. 3, lines 42-48} in both a transmitter and receiver (also shown in the table of column 3) wherein the plurality of pseudonyms are cyclically traversed by the transmitter and receiver during transmission {Dannhaeuser, col. 3, lines 1+}. Dannhaeuser teaches that this feature foils attempts of code grabbers from copying and re-using a single transmitted pseudonym to be used in unauthorized accesses {Dannhaeuser, col. 1, lines 26+}. The

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systems of Dannhaeuser and Hughes are analogous art because they are from the same field of endeavor (wireless communications), and the same problem solving area. Hughes is concerned with communication security {Hughes, col. 2, lines 29+}. Obviously, the teaching of Dannhaeuser is desirable in the system of Hughes because it increases the communication security of Hughes. At the time of the invention, it would have been obvious to one of ordinary skill in the art to modify the system of Hughes to "transmit the different ones of the multiple secret key values (pseudonyms)", as taught by Dannhaeuser, because this feature increases security to a wireless communication by foiling attempts of code grabbers from copying and re-using a single transmitted pseudonym to be used in unauthorized accesses. Therefore, it would have been obvious to one of ordinary skill in the art to combine the system of Hughes with the system of Dannhaeuser to recite the limitations of claim 1.

In claims 4, the tag is configured to authenticate itself to an authenticator only after the authenticator has authenticated itself to the tag {Hughes, col. 7, lines 32-47}.

In claim 5, the authenticator authenticates itself to the tag by releasing to the tag a first challenge value (authentication value) unique to a given pseudonym transmitted by the tag {Hughes, col. 7, lines 16-23}.

In claim 6, the tag authenticates itself to the authenticator by releasing to the authenticator a second challenge value (authentication value) unique to a given pseudonym transmitted by the RFID device {Hughes, col. 7, lines 24-31}.

In claim 7, one or more of the pseudonyms each comprise an identifier of the tag {Hughes, col. 6, lines 57-65}. In this case, the tag key value identifies the tag.

In claim 20, a verifier is configured to store for a given RFID device Tx an address no. (a static identifier idx) corresponding to at least one pseudonym of Tx {Dannhaeuser, Fig. 2}.

In claim 23, a verifier specifies value identifying a particular pseudonym {Dannhaeuser, col. 3, lines 49+}.

In claim 24, the RFID device determines which of the plurality of pseudonyms to transmit responsive to a given reader query based at least in part on timing information {Dannhaeuser, paragraph bridging cols. 3 and 4}.

In claim 25, the method of claim 1 wherein the RFID device incorporates a pseudorandom number generator, where $fx(i)$ represents an output of the pseudorandom number generator for index i , where x is a key value (seed) associated with the RFID device {Hughes, col. 5, lines 53-64}.

Claims 30 and 32 recites a system/apparatus for practicing the method of claim 1 and therefore rejected for the same reasons.

Claim 33 recites the limitations of claim 1 and therefore rejected for the same reasons, further comprising the pseudonyms are determined by utilizing an updateable set of one-time pads (index designators) maintained in the device as shown in steps S1-S6 of the flowchart in figure 3 of Hughes {Hughes, col. 6, lines 12-46}. Also see Dannhaeuser, col. 4, lines 5-24.

4. Claims 3 and 31 are rejected under 35 U.S.C. 103(a) as being unpatentable over USP 6,842,106 (Hughes et al) in view of USP 4,928,098 (Dannhaeuser), and further in view of USP 6,724,895 (Turner et al).

In claim 3, Hughes does not disclose expressly **“the transmitted pseudonyms are authenticated by an authenticator (verifier) other than the reader”**. Turner, in the same field of endeavor, teaches of having a plurality of readers/verifiers in an RFID system {col. 4, lines 40-42}. Since a verifier is also a reader {Turner, Figure 1}, clearly, anyone of them is the reader and anyone of them is the verifier. And since the reader of Hughes is also an authenticator {Hughes, col. 6, lines, 15-16}, a plurality of readers in the system of Hughes, as evidenced by Turner, would have an authenticator authenticating the transmitted pseudonym that is other than the reader. Therefore, at the time of the invention, it would have been obvious to one of ordinary skill in the art to have a plurality of readers in the system of Hughes, as evidenced by Turner, wherein an authenticator authenticates the transmitted pseudonym that is other than the reader.

Claim 31 recites a system for practicing the combination of method claims 1 and 3, and therefore rejected for the same reasons.

5. Claims 9-13, 14-16, 26-27, and 29, are rejected under 35 U.S.C. 103(a) as being unpatentable over USP 6,842,106 (Hughes et al) in view of USP 4,928,098 (Dannhaeuser), and further in view of USP 6,225,889 (Furuta et al).

In claims 9-13, although Hughes in view of Dannhaeuser teach that the pseudonyms (multiple secret key values) are stored in the RFID device as an ordered

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list of pseudonyms {Hughes, col. 7, lines 52-53; Dannhaeuser, Fig. 3}, Hughes does not disclose expressly **“the step of designating a particular one of the pseudonyms as a current pseudonym and, in response to a given reader query, transmitting the current pseudonym, wherein over a plurality of reader queries the pseudonym designated as the current pseudonym periodically cycles through the list of pseudonyms”**. Furuta et al, in the same field of endeavor (transponder systems), teach of a method of producing rolling codes between a vehicle transceiver 2 (analogous to the claimed reader) and key transceiver 1 (analogous to the claimed RFID device). The rolling codes are constantly changed by cycling through a different one of a plurality of initial code variables (pseudonym) stored in the memory (5) of the vehicle transceiver 2, shown in Figure 3 {Furuta, col. 5, lines 13-26}. Initially, one of the plurality of the initial code variable stored in the memory (5) of the vehicle transceiver 2 is designated as the current initial code variable, transmitted to the RFID device and stored in the memory of the RFID device (as claimed in 10 and 12) {Furuta, col. 4, lines 17-29}. So that in response to an as needed initial reader query (as claimed in 11), the current initial code variable stored in the memory of the RFID device is used to produce a unique rolling code {Furuta, col. 6, lines 53+} and transmitted to the reader {Furuta, col. 7, lines 11+}. In the case of a mismatched determination, a given period of time is given to a user to transmit another rolling code (as claimed in 13) {Furuta, col. 8, lines 4-11}. Obviously, these features are desirable in the system of Hughes because it provides a high degree of security without compromising system cost, to one of ordinary skill in the art.

In claims 14-16, the initial code variable may be altered sequentially (as claimed in 14) by the reader {Furuta, col. 8, lines 60+}, in response to receipt of refresh information (as claimed in 15) {Furuta, col. 8, lines 18-22}, after the current initial code variable is determined to be invalid (as claimed in 16) {Furuta, col. 7, lines 63+}. Furuta et al teach that the method above is capable of producing rolling codes with a high degree of security using a simple algorithm that do not require large storage capacity {Furuta, col. 1, lines 61-65}. Hughes is concerned with tradeoffs between level of security and system cost {Hughes, col. 7, lines 1-3}. Obviously, these features are desirable in the system of Hughes because it provides a high degree of security without compromising system cost, to one of ordinary skill in the art.

In claim 26, the method of claim 25 wherein the RFID device generates the plurality of pseudonyms as pseudonyms $c_1 = f(1)$, $c_2 = f(2)$, ..., $c_k = f(k)$ {Furuta, col. 8, lines 60-65}.

In claim 27, the method of claim 25 wherein the RFID device and a verifier of the system attempt to maintain a common counter d_x unique to the RFID device, and share the seed n {Hughes, col. 5, lines 46-50}.

In claim 29, the method of claim 27 wherein for a given counter value d , the RFID device computes $c_d = f(b_k + d)$, where b denotes a base value, and the verifier provides a subsequent instruction to the RFID device to increment the base value b {Furuta, col. 6, lines 48-52}.

(10) Response to Argument

6. Appellant's arguments have been fully considered but they are not persuasive.

In response to appellant's argument [appeal brief, paragraphs bridging pages 3 and 4, 5 and 6; page 6, 2nd paragraph+] that **there is no suggestion to combine the references**, the Examiner recognizes that obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. See *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988) and *In re Jones*, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992). In this case, the systems of Hughes and Dannhaeuser are analogous art because they are in the same field of endeavor, **"wireless communication"**, and they are in the same problem solving area, **"code protection of wireless signals"** (see MPEP 2141.01(a)). The "transmitting the different ones of the multiple secret key value (pseudonyms) of Dannhaeuser" was relied upon to provide security to a wireless communication by foiling attempts of code grabbers from copying and re-using a single transmitted pseudonym to be used in unauthorized accesses {Dannhaeuser, col. 1, lines 26+}. These features are clearly beneficial in the system of Hughes because Hughes was concerned with communication security {Hughes, col. 2, lines 29+}. Therefore, contrary to appellant's arguments, it would have been obvious, at the time of the invention, to modify the

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system of Hughes, as taught by Dannhaeuser, to increase the communication security of Hughes, to one of ordinary skill in the art.

In response to applicant's argument that **"RFID devices and remote keyless entry devices are entirely different types of devices"** is nonanalogous art [appeal brief, page 6, 2nd paragraph], it has been held that a prior art reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the applicant was concerned, in order to be relied upon as a basis for rejection of the claimed invention. See *In re Oetiker*, 977 F.2d 1443, 24 USPQ2d 1443 (Fed. Cir. 1992). In this case, the systems of Hughes and Dannhaeuser are analogous art because they are in the same field of endeavor, "wireless communication", and they are in the same problem solving area, specifically "code protection of wireless signals". Further, it is now conventional to use RFID devices in remote keyless entry systems, such as vehicle keyless entry systems. And further, the system of Dannhaeuser solves Hughes's concern of communication security and solves appellant's significant problem that conventional RFID tags are difficult to authenticate {appellant's specification, page 2, lines 12+}. See MPEP 2141.01(a).

TO RELY ON A REFERENCE UNDER 35 U.S.C. 103, IT MUST BE ANALOGOUS PRIOR ART.

The examiner must determine what is "analogous prior art" for the purpose of analyzing the obviousness of the subject matter at issue. "In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned." *In re Oetiker*, 977 F.2d 1443, 1446, 24 USPQ2d 1443, 1445 (Fed. Cir. 1992). See also *In re Deminski*, 796 F.2d 436, 230 USPQ 313 (Fed. Cir. 1986); *In re Clay*, 966 F.2d 656, 659, 23 USPQ2d 1058, 1060-61 (Fed. Cir. 1992) ("A reference is reasonably pertinent if, even though it may be in a different field from that of the inventor's endeavor, it is one which, because of the matter with which it deals, logically would have commended itself to an inventor's attention in considering his problem."); *Wang Laboratories Inc. v. Toshiba Corp.*, 993 F.2d 858, 26 USPQ2d 1767 (Fed. Cir. 1993); and *State Contracting & Eng'g Corp. v. Condotte America, Inc.*, 346 F.3d 1057, 1069, 68 USPQ2d 1481, 1490 (Fed. Cir. 2003) (where the general scope of a reference is

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outside the pertinent field of endeavor, the reference may be considered analogous art if subject matter disclosed therein is relevant to the particular problem with which the inventor is involved).

In response to appellant's argument that the references fail to show certain features of applicant's invention, it is noted that the features upon which applicant relies **are not recited in the rejected claim(s) as follows:**

- a) **RFID tags of the claimed arrangement broadcast their identifiers in a promiscuous manner to any nearby readers** [appeal brief, page 6, last paragraph];
- b) **one-time pad is a type of cryptographic construct** [appeal brief, page 10];

Although the claims are interpreted in light of the specification, limitations from the specification are not read into the claims. See *In re Van Geuns*, 988 F.2d 1181, 26 USPQ2d 1057 (Fed. Cir. 1993). The claims are broader than what appellant argues.

The Examiner respectfully traverse appellant's argument (although not claimed) that, a) **"the secret value 66 of Hughes is not a pseudonym"** [appeal brief, page 4, last paragraph]; b) **"the Hughes challenge-response authentication process do not constitute pseudonyms as claimed"** [appeal brief, page 5, 4th paragraph]; c) **"the codes of Dannhaeuser do not provide any ability to uniquely identify a particular code transmitting device"** [appeal brief, page 5, last paragraph].

In a) and b), page 8 of appellant's specification clearly states that pseudonyms, by way of example, are **"seeds, secrets, hashes or other information are used to generate the pseudonyms"**, the multiple secret key values of Hughes are therefore

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pseudonyms, as claimed. And in c) even appellant admits **“RFID devices necessarily transmits device-identifying information** [appeal brief, page 4, 3rd paragraph]”, therefore the RFID device of Hughes transmits device-identifying information, and would read on appellant’s claimed RFID device. Further, the claims are broader than what appellant argues because there is no indication in the claims as what type of pseudonym is used. The claimed pseudonym is therefore broadly interpreted as the secret key value of Hughes, based on appellant’s specification. And, the secret key value of Hughes meets the claimed pseudonym.

In response to appellant’s argument that Hughes teaches away from the claimed arrangements [appeal brief, page 5, 1st paragraph], it is pointed out that appellant admits:

a) **the claimed RFID necessarily transmits device-identifying information** [appeal brief, page 4, 3rd paragraph];

b) **a given reader query of an RFID device constitutes a request for the device-identifying information of that device** [appeal brief, page 4, 4th paragraph];

Therefore, the system of Hughes does not teach away from the claimed arrangement because not only does Hughes teaches of the same RFID device as characterized by the appellant, the system of Hughes also recites the claimed RFID device.

In response to appellant's argument that since **"Hughes provides a challenge-response authentication process and Dannhaeuser teaches code rotation"**, the technique of Dannhaeuser is not desirable and not workable in an RFID system of Hughes [appeal brief, page 7, last paragraph], the fact that applicant has recognized another advantage which would flow naturally from following the suggestion of the prior art cannot be the basis for patentability when the differences would otherwise be obvious. See *Ex parte Obiaya*, 227 USPQ 58, 60 (Bd. Pat. App. & Inter. 1985).

In response to appellant's arguments against the references individually [appeal brief, page 7, 3rd paragraph+], one cannot show nonobviousness by attacking references individually where the rejections are based on combinations of references. See *In re Keller*, 642 F.2d 413, 208 USPQ 871 (CCPA 1981); *In re Merck & Co.*, 800 F.2d 1091, 231 USPQ 375 (Fed. Cir. 1986).

In response to appellant's argument that **"if the Dannhaeuser code rotation were applied to the secret value 66 of Hughes, it would appear to be very difficult and highly impractical to coordinate such secret key value rotation between all the tags and the reader"** [appeal brief, page 7, last paragraph], the fact that applicant has recognized another advantage which would flow naturally from following the suggestion of the prior art cannot be the basis for patentability when the differences would otherwise be obvious. See *Ex parte Obiaya*, 227 USPQ 58, 60 (Bd. Pat. App. & Inter. 1985). Further, Hughes teaches that the authentication system can be realized

with the use of multiple keys, both public and private {col. 7, lines 48-58}. The use of which is another variation of code rotation.

In response to appellant's argument that the Examiner's conclusion of obviousness is based upon improper hindsight reasoning [appeal brief, page 8, 2nd paragraph], it must be recognized that any judgment on obviousness is in a sense necessarily a reconstruction based upon hindsight reasoning. But so long as it takes into account only knowledge which was within the level of ordinary skill at the time the claimed invention was made, and does not include knowledge gleaned only from the applicant's disclosure, such a reconstruction is proper. See *In re McLaughlin*, 443 F.2d 1392, 170 USPQ 209 (CCPA 1971).

In response to appellant's arguments [page 8, 3rd paragraph] that:

"Since the Dannhaeuser teachings were made available to the public in 1990, upon publication of the corresponding patent document, and conventional RFID systems have also been well known for many years, one cannot help but wonder why those skilled in the art, despite long exposure to the teachings of Dannhaeuser as well as conventional RFID systems, have not heretofore made the combination that is alleged to be obvious by the Examiner. This failure of others to develop the advantageous approach set forth in the present application is believed to constitute strong evidence of non-obviousness" is moot since Hughes is the primary reference used to reject appellant's claims. The Examiner recognizes that obviousness can only

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be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge generally available to one of ordinary skill in the art. See *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988) and *In re Jones*, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992). Dannhaeuser was relied upon to provide security to the wireless communication of Hughes by foiling attempts of code grabbers from copying and re-using a single transmitted pseudonym to be used in unauthorized accesses {Dannhaeuser, col. 1, lines 26+}. Since Hughes was concerned with communication security {Hughes, col. 2, lines 29+}, it would have been obvious to one of ordinary skill in the art to readily recognize that the security features taught by Dannhaeuser are clearly beneficial in the system of Hughes.

With regards to appellant's arguments [appeal brief, page 8] of dependent claims 5-6, 20, and 25-29, these claims recite mathematical formulas that amounts to abstract ideas that can be practiced by the random number generator of Hughes or the code sequencing of Dannhaeuser.

With regards to appellant's arguments [appeal brief, page 8] of dependent claims 2-4, 7-16, and 23-24, and with the rest of the claims, appellant's arguments fail to comply with 37 CFR 1.111(b) because they amount to a general allegation that the claims define a patentable invention without specifically pointing out how the language of the claims patentably distinguishes them from the references.

In response to appellant's arguments that **"the characterizations made by the Examiner is improper (i.e. claim 31 recites the combination of claims 1 and 3) [appeal brief, page 11, 2nd paragraph]"**, it is noted that appellant admits the limitations of claims 1 and 3 are a lot narrower than the limitations of claim 33. A narrower claim reads on a broader claim.

Finally, with regards to appellant's argument that **"the appellant has brought these deficiencies to the attention of the Examiner, but the Examiner has apparently declined to take any action to correct them"** [appeal brief, page 11, 4th paragraph], it is noted that appellant's arguments fail to comply with 37 CFR 1.111(b) because they amount to a general allegation that the claims define a patentable invention without specifically pointing out how the language of the claims patentably distinguishes them from the references. Instead, appellant had consistently argued, that the Hughes and Dannhaeuser references are not combinable. That these references are non-analogous art, that there is no motivation to combine these references, that these references teaches away from the claimed invention, or the appellant has different reasons for combining the references. And, either appellant argues what is not claimed or appellant contradicts the main arguments. i.e. Appellant's argument that **"the codes of Dannhaeuser do not provide any ability to uniquely identify a particular code transmitting device"** [appeal brief, page 5, last paragraph] was not relied upon to reject the claims. It was the RFID device of the Hughes

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reference that was relied upon to teach of these claimed features. Appellant contradicts the argument that the RFID device of Hughes does not disclose such features by admitting that it is inherent for RFID devices to teach of such features [appeal brief, page 4, 3rd paragraph] and a given reader query of an RFID device constitutes a request for the device-identifying information of that device [appeal brief, page 4, 4th paragraph]; Appellant contradicts the main argument that **“the secret value 66 of Hughes is not a pseudonym”** [appeal brief, page 4, last paragraph] and **“the Hughes challenge-response authentication process do not constitute pseudonyms as claimed”**. As pointed out in the Final Office action, **page 8 of appellant’s specification clearly states that pseudonyms, by way of example, are “seeds, secrets (i.e. secret value 66), hashes or other information are used to generate the pseudonyms”**.

For the above reasons, it is believed that the rejections should be sustained.

(11) Related Proceeding(s) Appendix

No decision rendered by a court or the Board is identified by the Examiner in the Related Appeals and Interferences section of this Examiner’s answer.

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Respectfully submitted,

William L. Bangachon


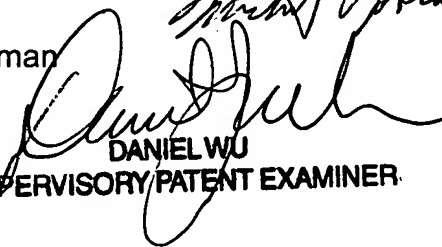
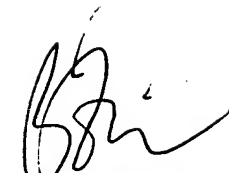


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